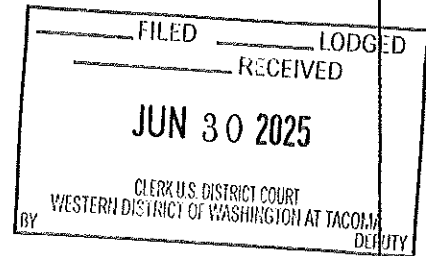


WAWD – Praeipce (Revised 6/2021)



UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

LaWanda A. Johnson, Ph.D.

Plaintiff(s),

CASE NO. 2:25-cv-01181-DWC

v.

Dept. of Justice  
Fed. Bureau of Prisons  
component)

PRAECIPE

Defendant(s).

To the Clerk of the above-entitled court:

You will please:

...file page #2 of complaint (attached). It appears to have been inadvertently omitted. "Cf. Fed. Rule Civ. Proc. 60(a)- clerical errors in the record arising from oversight or omission may be corrected by the court at any time of its own initiative or on the motion of any party." (Day v. McDonough: 547 U.S. 198, 210 (2006)).

6/27/2025

Dated

LaWanda A. Johnson, Ph.D. / 

Sign or use an "s/" and your name

LaWanda A. Johnson, Ph.D.

P.O. Box #561  
Aberdeen, WA (98520)

In propria persona

Name, Address, and Phone number of Counsel or Pro Se

## THE PARTIES

3. Plaintiff, LaWanda A. Johnson, Ph.D., is a *patient* within the meaning of 42 U.S.C. § 290dd-2 and 42 C.F.R. Part 2. (See 42 C.F.R. § 2.11- *patient*).
4. Defendant DOJ is a Department of the Executive Branch of the United States Government and includes component entity BOP (5 C.F.R. § Pt. 2641, App. B). The DOJ is an agency within the meaning of 5 U.S.C. § 552(f).

## DOJ / BOP ACQUISITION OF PLAINTIFF'S MEDICAL INFORMATION

5. While confined, the BOP managed all of Ms. Johnson's health care (see *Estelle v. Gamble*, 429 U.S. 97, 103 (1976)); including, RDAP<sup>1</sup> by authority of 18 U.S.C. § 3621(b).
6. Regarding substance use disorder treatment, the BOP "shall ... make arrangements for appropriate aftercare" (18 U.S.C. § 3621(e)).
7. Generally, it is not harmful for a *patient* to have information about his or her substance abuse treatment (42 C.F.R. § 2.23); and, such information is routinely disclosed. (89 FR 49906- <https://www.federalregister.gov/d/2024-12221/p-31>).
8. Because it appears the DOJ / BOP cannot satisfy the "foreseeable harm" requirement of FIA (5 U.S.C. § 552(a)(8)(A)(i)), the DOJ / BOP cannot withhold records responsive to plaintiff's lawful FOIA request.

## PLAINTIFF'S FOIA REQUEST

9. Ms. Johnson submitted a Freedom of Information Act ("FOIA"), request. (See Ex. A<sup>2</sup>).

## DEFENDANT'S FAILURE TO TIMELY COMPLY WITH PLAINTIFF'S FOIA REQUEST

<sup>1</sup> Residential Drug Abuse Treatment Program (28 C.F.R. § 550.53).

<sup>2</sup> Exhibits are attached to the Declaration in Support of Complaint for Injunctive relief filed contemporaneously.  
COMPLAINT FOR INJUNCTIVE RELIEF. (5 U.S.C. § 552). - 2

LaWanda A. Johnson, Ph.D.  
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The Honorable D.W. Christel

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

LAWANDA A. JOHNSON, PH.D.,  
Plaintiff,  
vs.

Case No. 2:25-cv-01181-DWC

U.S. DEPARTMENT OF JUSTICE  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

CERTIFICATE OF SERVICE

and Component

Federal Bureau of Prisons  
320 First Street, N.W.  
Washington, DC 20534  
Defendant.

I hereby certify that I mailed copies of: 1) Praecipe and 2) Attachment to Praecipe (*i.e.*,  
page 2 of Complaint), to:

- a) DOJ at 950 Pennsylvania Ave. NW, Wash D.C. 20530-0001
- b) FBOP at 320 First St. NW, Wash D.C. 20534
- c) Teal L. Miller, USA at 700 Stewart St. suite 5220, Seattle, WA 98101-1271
- d) Jolene Anne Lauria, at 950 Pennsylvania Ave. NW, Rm 1111, Wash D.C. 20530

and copies were hand delivered to the Clerk of the Court for electronic filing using the  
CM/ECF system which will also send notification of such filing to the persons listed above.

Dated this 30<sup>th</sup> day of June, 2025.

  
Antoine D. Johnson, MD (process server)